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Granted.

December 8, 2021

Dated: December 9, 2021

VIA ECF

The Honorable Denise L. Cote
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1910
New York, NY 10007



DENISE COTE
United States District Judge

Re: *FTC, et al. v. Vyera Pharmaceuticals, LLC, et al.*, Case No. 1:20-cv-706 (DLC)

Dear Judge Cote:

On behalf of Martin Shkreli, I hereby respectfully request permission to file under seal Exhibit A to Mr. Shkreli's Response to the Court's November 16, 2021 Order Concerning Mr. Bradshaw's Affidavit (ECF 599). Pursuant to the Court's September 17, 2020 Order (ECF No. 261), I respectfully provide the Court with the reason for the requested sealing of Exhibit A to Mr. Shkreli's Response. Exhibit A contains third-party information that the Court has already ordered to be sealed (ECF 580), and other third-party information that is not public. Much of the information in Exhibit A pertains to third-party information. The sealing of this information is necessary to preserve the higher values of protecting confidential information of third parties and is narrowly tailored to achieve the aim of preserving such higher values.

In accordance with Rule 7.B of Your Honor's Individual Practices in Civil Cases and with the requirements for electronically filing under seal, Mr. Shkreli will publicly file the Response with a slip sheet for Exhibit A, and on a separate docket entry, Mr. Shkreli will file under seal the unredacted Response and Exhibit A.

Respectfully submitted,

/s/ Christopher H. Casey
Christopher H. Casey

CHC